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August 9, 2021

VIA ECF

Hon. Leda Dunn Wettre, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Bldg.
& U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Deborah Gross-Quatrone v. Bonnie Mizdol, et al.,
Civil Action No. 17-cv-13111 (JXN) (LDW)

Dear Judge Wettre:

"First, we did not ask Your Honor to determine the briefing schedule for the appeal."

Letter from Kathleen Dohn to the Hon. Leda Dunn Wettre, U.S.M.J., dated August 9, 2021.

"Therefore, Defendants propose the following scheduling order: Plaintiff file the appeal by August 9, 2021 and Defendants respond by August 11, 2021. Defendants submit that no reply is necessary given the straightforward nature of the issues."

Letter from Kathleen Dohn to the Hon. Leda Dunn Wettre, U.S.M.J., dated August 5, 2021.

"Third, contrary to Plaintiff's counsel's assertions in his August 6, 2021 letter, Defendants in the state matter are seeking appellate review and a stay of all of Judge Hurd's orders – on the motions to quash as well as on the motion to dismiss."

Letter from Kathleen Dohn to the Hon. Leda Dunn Wettre, U.S.M.J., dated August 9, 2021.

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“Defendants propose to seek interlocutory appellate review over one issue, namely that of jurisdiction. . . . Defendants intend to file a motion, before this Court, seeking leave to appeal the denial of its June 1, 2021 Motion to Dismiss.”

Defendants' Brief in Support of Defendants' Motion for a Stay of Proceedings, at 2, 7 (August 4, 2021).

“Finally, we are solely asking Your Honor for assistance in clawing back documents inadvertently provided *in this* matter. We are not asking Your Honor to enjoin, dismiss, or take any action in the matter pending in state court and any assertion to the contrary is a misreading of our submission to this Court.”

Letter from Kathleen Dohn to the Hon. Leda Dunn Wettre, U.S.M.J., dated August 9, 2021.

“We respectfully request that the Court . . . permit Defendants to file a motion seeking an Order pursuant to Fed. R. Civ. P. 26 and R.P.C. 4.4 to . . . (3) provide that Plaintiff's counsel must take steps to remove the mistakenly produced documents from their public filings in the State Court litigation and cannot use the documents in that litigation for any purpose.”

Letter from Kathleen Dohn to the Hon. Leda Dunn Wettre, U.S.M.J., dated July 20, 2021.

Respectfully submitted,

THE DWYER LAW FIRM, L.L.C.

/s/ Andrew Dwyer

Andrew Dwyer

Cc: Kathleen Dohn (via ECF)
Kayla Louis (via ECF)
Ralph Ferrara (via ECF)
Kevin Kotch (via ECF)